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January 8, 2025

Via ECF

The Honorable Valerie Figueredo
Daniel Patrick Moynihan
United States Courthouse, S.D.N.Y.
500 Pearl Street
New York, NY 10007

RE: *Vinci Brands, LLC v. Coach, Inc., et al.*, No. 1:23-cv-05138-LGS-VF
Case-Mate's Letter Motion to Seal

Dear Judge Figueredo:

Pursuant to Rule I.g.2 of Your Honor's Individual Practices in Civil Cases, Case-Mate, Inc. ("Case-Mate") respectfully requests Your Honor's approval to file under seal relevant portions of the Kristen Trappett deposition transcripts as referenced in footnote 3 of the parties' January 7, 2025 Joint Letter Regarding Issues to be Addressed in the January 14, 2025 Discovery-Dispute Conference [ECF 689] (the "Joint Letter"). Case-Mate designates these documents as Exhibit D to the Joint Letter.

Case-Mate seeks to file Exhibit D under seal to allow Vinci Brands, LLC and Onward Brands, LLC an opportunity to permanently seal it as it contains testimony concerning exhibits that have been marked Confidential by either Vinci Brands, LLC or Onward Brands, LLC pursuant to the Stipulation and Confidentiality Agreement and Order [ECF 233] (the "Confidentiality Stipulation").

To ensure its compliance with the Confidentiality Stipulation, Confidential Exhibit D is submitted with this Letter Motion to Seal for the Court's consideration.

We thank the Court for its attention to this matter.

MEMO ENDORSED


HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 1/14/25

The motion for a provisional seal is GRANTED. Interested parties are directed to make a showing under Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110 (2d Cir. 2006) by **February 14, 2025** in order to permanently seal the document. The Clerk of Court is directed to terminate the motion at ECF No. 697.

Respectfully submitted,

/s/ Lyndsey Stults

Lyndsey Stults (Counsel for Case-Mate, Inc.)